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CLERK US BANKRUPTCY COURT
DISTRICT OF OREGON

04 NOV 15 P1:25

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PAID bc DOCKETED bc

IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In Re:

ROMAN CATHOLIC ARCHBISHOP
OF PORTLAND IN OREGON, AND
SUCCESSORS, A CORPORATION
SOLE, dba the ARCHDIOCESE OF
PORTLAND IN OREGON,

Debtor.

Case No.: 04-37154-e1p11

**DECLARATION OF DAVID SLADER
IN SUPPORT OF REPLY
MEMORANDUM REGARDING
DISCOVERY**

David Slader declares as follows:

1. I am over 18 years of age and if called as a witness, I could and
2 would competently testify to the matters set forth in this declaration from my
3 own personal knowledge.

4. I have negotiated (usually successfully) with debtor over 40 lawsuits
5 involving allegations of child sexual abuse by priests employed by the
6 Archdiocese of Portland.

7. Substantially greater compensation has been consistently paid by
8 debtor in those cases in which I had uncovered evidence of actual negligence

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**Page 1 - DECLARATION OF DAVID SLADER IN SUPPORT OF REPLY
MEMORANDUM REGARDING DISCOVERY**

DAVID SLADER

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A PROFESSIONAL CORPORATION

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1 and fault on the part of the Archdiocese. The greater the fault that could be
2 proven, the greater has been the settlement value of the claims (assuming other
3 factors being equal). Claims based exclusively on a *respondeat superior* theory
4 have consistently settled for less than an otherwise comparable case in which
5 negligence could be proven.

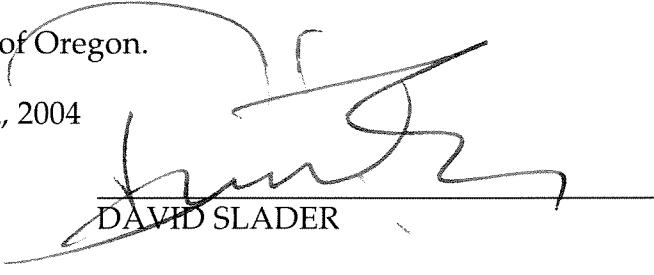
6 4. I have had numerous conversations with various attorneys for the
7 Archdiocese in which those attorneys have acknowledged that a case's
8 settlement value was significantly related to the strength of the evidence of the
9 Archdiocese's negligence and fault.

10 5. Several mediators who have facilitated negotiations between the
11 abuse plaintiffs and the Archdiocese have required me to "rate" cases based on
12 various criteria, among which was the strength of the evidence of negligence
13 and fault.

14 6. Evidence of negligence and fault is significant to settlement value
15 because experienced litigators know that it is significant to the result at trial.

16 I declare that the above statements are true to the best of my knowledge
17 and belief, and that I understand these statements are made for use as evidence
18 in court and are subject to penalty for perjury under the laws of the United
19 States of America and the State of Oregon.

20 Dated: November 12, 2004



DAVID SLADER

23 Page 2 - **DECLARATION OF DAVID SLADER IN SUPPORT OF REPLY**
24 **MEMORANDUM REGARDING DISCOVERY**

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CERTIFICATE OF SERVICE

I hereby certify that on November 15, 2004, I served the foregoing TORT CLAIMANTS' REPLY MEMORANDUM REGARDING GENERAL DISCOVERY REQUESTS on the following by mailing to each a copy thereof to the address(es) below, each contained in a sealed envelope, with postage prepaid, and deposited in the United States Post Office at Portland, Oregon.

Roman Catholic Archbishop of
Portland in Oregon, and successors, a
corporation sole, dba the Archdiocese
of Portland in Oregon
Attn: Paulette Furness, Director of
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Portland, Oregon 97214

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By: 
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